

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

LUIS ANGEL RAMOS,)
PETITIONER, Case no.
VS.) 03-315

UNITED STATES OF AMERICA

RESPONDENT,) Hon. Judge

Edward R. korman

MOTION FOR APPOINTMENT OF COUNSEL

COMES NOW, LUIS ANGEL RAMOS THE PETITIONER IN PRO-SE
CAPACITY RESPECTFULLY REQUESTING THIS HONORABLE COURT TO
APPOINT HIM COUNSEL DUE TO THE FOLLOWING :

THIS MOTION IS IN RELATION TO PETITIONER'S CLAIM TO VACATE
ILLEGAL SENTENCE AND CONVICTION PURSUANT TO JOHNSON V. UNITED
135 s.ct.2551 (2015) AND STATES, WELCH V. UNITED STATES,
578U.S.____(2016), UNITED STATES V. CORY JONES CASE NO. 15-
1518- cr (S.CT) (2016) AND OTHER MORE COMPLICATED ISSUES THAT
MAY WARRANT A NEW TRIAL OR A RE-SENTENCING HEARING. SUCH AS
TRIAL TRANSCRIPTS (SENTENCING MINUTES) ARE NOT COMPLETE ITS
DAMAGE. (SEE: EXHIBIT A AND B) THERE ARE CRUCIAL TESTIMONY
AND ISSUES MISSING THAT I NEEDED TO RAISE IN MY PREVIOUS
APPEALS.

I WAS MADE AWARE THAT MY APPEAL LAWYER MR. BOMNSTONG NEVER HAD A COPY OF SENTENCING MINUTES WHEN HE DONE MY DIRECT APPEAL AND CERT. FOR YEARS I HAVE BEEN TRYING TO LOCATE THE SENTENCING MINUTES (SEE EXHBIT C.) HERE ARE ALL THE STEPS

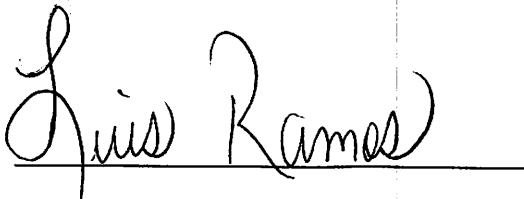
I HAVE TAKEN THRU OUT THE YEARS TRYING TO OBTAIN IT AND REPLY TO MY REQUEST SEE:EHIBIT D.

ALSO I NEED TO CHALLENGE CAREER CRIMINAL OFFENDER STATUS AS WELL AS INEFECTIVE ASSISTANCE OF COUNSEL. AND WAS INFORM THAT A NEW DECISION BY THE SECOND CIRCUIT WAS MADE BASE ON JOHNSON. JUDGE KORMAN I HAVE BEEN DOING ALL I CAN WITH THE ASSISTANCE OF OTHER INDIVIDUALS THAT HAVE LIMMITED KNOWLEDGE OF THE LAW. I'VE BEEN INCARCERATED FOR THE LAST 2 DECADES I HAVE NO MONEY TO OBTAIN AN ATTORNEY AND MY WRITTING SKILLS PALE TO THAT OF AN ATTORNEY.

I NEED HELP AND PRAY THAT YOUR HONOR GIVES ME THIS ONE LAST SHOT ON THE SOUND DISCREETION OF THIS DISTRICT COURT. I FIND THAT THE INTEREST OF JUSTISE WOULD BE BETTER SERVED WITH LEGAL COUNSEL ADDRESSING PETITIONERS ISSUE.

YOUR HONOR I HAVE A LIFE-TERM OF IMPRISONMENT AND I MERELY, MOST HUMBLY, REQUEST ONE FINAL OPPORTUNITY TO BE HEARD. THANK YOU FOR YOUR TIME AND HOPE THAT AT THE MINIMUM YOUR HONOR WILL GRANT ME A HEARING AS TO THE ISSUES RAISED.

RESPECTFULLY SUBMITTED,

A handwritten signature in cursive script, reading "Luis Angel Ramos", is written over a horizontal line.

LUIS ANGEL RAMOS

#70000-053

U.S.P. LEE

P.O. BOX 305

JONESVILLE, VA. 24263